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Attorneys for Plaintiff and the proposed class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE**

KAYLANI LEPOLO an individual, on behalf
of herself and others similarly situated,

PLAINTIFF,

v.

CORONA POST ACUTE, LLC; and DOES 1
thru 50, inclusive,

DEFENDANTS.

CASE NO. CVRI2401478

[Case Assigned for All Purposes to Hon. Harold
W. Hopp in Dept. 1]

**DECLARATION OF KAYLANI LEPOLO
IN SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF REPRESENTATIVE
ACTION SETTLEMENT**

Date: January 29, 2026

Time: 8:30 A.M.

Dept.: 1

Reservation ID: 583637244858

Complaint Filed: March 20, 2024

Trial Date: None Set

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I, Kaylani Lepolo, state and declare as follows:

1. I am a competent adult, over the age of eighteen and the named Plaintiff in the matter of KAYLANI LEPOLO, an individual, on behalf of herself and others similarly situated v. Corona Post Acute, LLC; and DOES 1 thru 50, inclusive, Sacramento County Superior Court, Case No. CVRI2401478. The foregoing is based upon my personal knowledge and, if called as a witness, I could and would competently testify thereto. I am making this sworn declaration in support of my claims and the claim of my co-workers, and in support of my qualifications as the named Plaintiff representing the State of California and the Aggrieved Employees. If called as a witness, I could and would competently testify as to the truth of the matters set forth herein.

2. I worked as a Health Information Specialist for Corona Post Acute, LLC (“Defendant” or “Corona Post”).

3. In my role as a Health Information Specialist, I regularly did not receive reimbursement for using my personal cell phone for work-related purposes. I also regularly was not provided accurate wage statements with total hours worked, including applicable hourly rates.

4. I have spent significant time throughout this class action working with PAGA Counsel. Before filing this action, I researched and identified Counsel that I believed could best represent the interests of the Aggrieved Employees. I also assisted the attorneys with investigation and gathering of information including discussing my work experience and the experience of others that I had observed while working for Defendant and provided all relevant employment documents in my possession. In addition, I attended a full-day mediation on March 14, 2025. While at the Mediation, I actively participated in the discussions with the PAGA Counsel and shared my knowledge and insights in order to help the Aggrieved Employees obtain a favorable settlement.

5. Although I did not keep contemporaneous time records, I estimate I spent approximately 10-15 hours on these activities throughout the entirety of this case.

6. Throughout the entirety of this litigation, I have maintained regular contact with PAGA Counsel and assisted in any way possible by providing information and making myself available as needed.

7. I was aware that by helping to initiate this lawsuit, my name would become known and it was possible that my involvement in this matter could make it more difficult for me to obtain employment in this field. Regardless, I believed it was important to proceed with this matter on my behalf and on behalf of all others who were subject to the same problems during their employment with Defendant.

8. Based upon my participation in this case, I understand the merits of this settlement and I strongly support the settlement and believe it is fair and reasonable, and in the best interest of the class. I believe this Settlement will benefit the Aggrieved Employees.

9. It is my opinion that a fair and adequate enhancement for me as the named Plaintiff is \$5,000.00. I believe that it is fair and reasonable in view of all of the work I have performed in my role as a named Plaintiff. As the named Plaintiff, I actively participated in all stages of the litigation as detailed above and have always maintained the best interest of the Aggrieved Employees while performing my named Plaintiff duties.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 2 day of October, 2025 at Riverside,
California. (City)

Kepoh

Kaylani Lepolo
Declarant

(PROOF OF SERVICE)
[CCP 1013(a)(3)]
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On October 22, 2025, I served all interested parties in this action the following documents described as: **DECLARATION OF KAYLANI LEPOLO IN SUPPORT OF PLAINTIFF'S MOTION FOR APPROVAL OF REPRESENTATIVE ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

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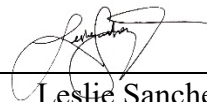
Attorneys for Plaintiff and the proposed class

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/432>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] BY ELECTRONIC MAIL TRANSMISSION: I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the below email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on October 22, 2025, at Chino, California.



Leslie Sanchez